

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

L.B., by and through her parents and
guardians, Michael Booth and Jennifer
Booth,

Plaintiff,

v.

SIMPSON COUNTY SCHOOL DISTRICT; the
BOARD OF EDUCATION OF SIMPSON
COUNTY, MISSISSIPPI; GREG PAES,
Superintendent of the Simpson County
School District, in his official and
individual capacities; ROBERT SANDERS,
Assistant Superintendent of the Simpson
County School District, in his official and
individual capacities; and ANTOINETTE
WOODALL, Principal of Simpson Central
School, in her official and individual
capacities,

Defendants.

Civil Case No. 3:20-cv-704-HTW-LRA

UNOPPOSED MOTION TO EXTEND TIME TO FILE REBUTTAL AND WITHDRAWING
MOTION TO STAY

Although the parties had a settlement agreement in principle, the parties have been unable to progress on further negotiations.

On Wednesday, November 25, the parties reached an agreement in principle as to the material terms for the settlement.

This morning after the parties filed the Motion to Stay the proceedings, Defendants' counsel sent a settlement agreement to Plaintiff's counsel. But the settlement agreement was inconsistent with the terms agreed upon by Plaintiff's counsel. After further discussions with Defendants' counsel this afternoon, the parties have determined that a settlement might be infeasible at this time.

Accordingly, Plaintiff respectfully withdraws the earlier motion to stay the proceedings in this case. Plaintiff also respectfully requests a 6-day extension for time

to file a rebuttal brief supporting Plaintiff's Motion for Preliminary Injunction to move the due date from today, December 2, to next Tuesday December 8.

Plaintiff's counsel has conferred with Defendants' counsel, and Defendants do not oppose this motion.

Respectfully submitted,

s/ Tyson C. Langhofer

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**Admitted Pro Hac Vice*